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**VIA ECF**

Hon. Colleen McMahon  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

MEMO ENDORSED

OK  
Colleen McMahon  
12/7/2021

**Re: Telebrands Corp v. www.christmas-decors.com, et al.,  
Case No. 21-cv-7799  
Request for an Extension of Time to File Motion for Default Judgement**

Dear Judge McMahon,

We represent Plaintiff Telebrands Corp. ("Plaintiff"), in the above-referenced matter.<sup>1</sup> By letter dated November 10, 2021, Plaintiff requested, *inter alia*, to file its Motion for Default Judgment within thirty (30) days ("November 10, 2021 Letter"). (Dkt. 30). By Order dated November 11, 2021, the Court granted Plaintiff's request. (Dkt. 31). For the reasons set forth herein, Plaintiff respectfully requests an extension of time to file its Motion for Default Judgment.

After Plaintiff filed the November 10, 2021 Letter, Defendants reached out to Plaintiff's counsel to discuss resolving this matter. In light of the recent communications amongst the parties, and in hopes of potential settlement, Plaintiff respectfully requests that its current deadline to file its Motion for Default Judgment be extended by sixty (60) days until February 10, 2022. This is Plaintiff's first request for an extension of time to file its Motion for Default Judgment.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

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<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.